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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF WYOMING**

In re:)
) Case No.: 16-20326
POWELL VALLEY HEALTH CARE,) Chapter 11
INC.,)
Debtor.)

**UNOPPOSED MOTION TO VACATE AND CONTINUE HEARING ON
DEBTOR'S DISCLOSURE STATEMENT**

Undersigned counsel for Powell Valley Health Care, Inc. (the "Debtor") hereby files this Motion to Vacate and Continue Hearing on the Debtor's Disclosure Statement (the "Motion"), and in support thereof would show the Court as follows:

1. On May 16, 2016 (the "Petition Date"), the Debtor commenced this case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Wyoming (the "Bankruptcy Court").

2. The Debtor has continued in the possession of its property and has continued to operate and manage its business as a debtor-in-possession pursuant to Bankruptcy Code §§ 1107 and 1108.

3. On April 24, 2017, the Debtor filed its Disclosure Statement in Support of Chapter 11 Plan of Reorganization dated April 24, 2017 (the “Disclosure Statement”) (Doc. # 498).

4. On May 12, 2017, this Court ordered that any objections to the proposed Disclosure Statement be filed with the Court on or before June 22, 2017. The Court also set an evidentiary hearing on the Disclosure Statement for July 6, 2017.

5. Concurrently herewith, the Official Committee of Unsecured Creditors (the “Committee”) has filed with this Court a motion, on consent of all parties set forth herein (the “Mediation Parties”), asking the Court to direct the Mediation Parties to attend a mediation. The Mediation Parties are as follows:

- ☐ Debtor Powell Valley Healthcare, Inc.
- ☐ The Committee.
- ☐ The Tort Claimants, by and through their respective counsel, Jon Moyers, William Fix, Robert Krause, Randy Royal and Collin Hopkins (representing the Tort Claimants listed on Exhibit A attached hereto).
- ☐ UMIA Insurance, Inc. (“UMIA”).
- ☐ Lexington Insurance Company (“Lexington”).
- ☐ One Beacon Insurance Company (“Homeland”).
- ☐ HealthTech Management Services, Inc. (“HTMS”).
- ☐ William D. Patten (“Patten”).
- ☐ Dr. Jeffrey Hansen.
- ☐ Powell Hospital District (the “District”).

6. The purpose of the proposed mediation is to reach a consensual resolution by and among the Mediation Parties and their claims in the Debtor's Disclosure Statement and proposed plan of reorganization. The Mediation Parties propose that the mediation shall be held during the first weeks of August, 2017.

7. *All Mediation Parties have agreed that it would be in their best interests to vacate the hearing on the Disclosure Statement currently set for July 6, 2017 and to reschedule that hearing sixty (60) days from the date of this Motion.* The purpose of the extension would be to allow the Mediation Parties to focus their time and efforts on the mediation and achieving a consensual plan of reorganization.

8. The Debtor also requests that the deadline for those parties previously receiving an extension of time to object to the Debtor's Disclosure Statement (i.e., UMIA, Lexington, Homeland, HTMS and Patten) be further extended to seven days prior to the date of the rescheduled hearing on the Disclosure Statement.

WHEREFORE, for the reasons set forth herein, the Debtor respectfully requests that the Bankruptcy Court vacate the hearing on the Disclosure Statement set for July 6, 2017, reschedule the hearing sixty (60) days from the date of this Motion, and further extend the deadline for UMIA, Lexington, Homeland, HTMS and Patten to object to the Disclosure Statement to seven (7) days prior to the rescheduled hearing, and for such other and further relief as the Court deems proper.

Dated: Cheyenne, Wyoming
June 28, 2017

MARKUS WILLIAMS YOUNG AND
ZIMMERMANN LLC

By: /s/ Jennifer Salisbury
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CERTIFICATE OF SERVICE

The undersigned certifies that on June 28, 2017, a copy of the foregoing was served *electronically* via the Court's ECF system upon those parties indicated below:

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/s/Jessica Anderson

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